

## CITY-COUNTY PLANNING DEPARTMENT

Crook County & City of Prineville
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April 14, 1993

RECEIVED

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FCC - MAIL ROOM

Federal Communications Commission 1919 M St, Suite 222 Washington, DC 20554

RE: Comments on Docket 92-235

This is to express a concern about the potential impact of FCC Docket 92-235 on public safety radio users. It appears that it may have serious and costly effects nationwide on local emergency response systems. This is based on our evaluation of its impact here in Crook County, Oregon.

- (1) The whole concept seems to be questionable to begin with. Why require major, unnecessary changes to the public safety radio system, which ranks second in priority only to national defense, simply to create additional commercial radio channels.
- (2) The time table for implementation by January 1, 1996 is totally unrealistic when considering the fact that it will require major changes to most public safety radio systems.

Coverage will be reduced due to new limits on power which will require additional equipment; however, additional equipment will have to meet new requirements for bandwidth which will mean replacing all existing equipment because existing equipment is not compatible with the proposed bandwidth requirements.

- (3) Crook County is a large size county with 2,191 square miles, but it will not be possible to obtain the necessary coverage for our radio systems with reduced power.
- (4) Crook County, with a population of 15,000 to serve and with severe local budget constraints, cannot realistically afford to purchase a new radio system by January 1, 1996.

It would cost many of thousands of dollars for our Public Works and Sheriff's Office systems, just in replacement costs alone. This does not include estimated costs for additional equipment needed because of the limitations on power output.

We request that you delay implementation of this docket indefinitely and work with the Associated Public Safety Communications Officers, Inc. (APCO) to develop a proposal that FCC Page 2

will serve the public interest in maintaining the most viable public safety radio system possible.

Additionally, whenever the final product is implemented, a reasonable time frame for implementation needs to be provided so as not to create a negative impact on local government.

Crook County Board of Commissioners

Fred Rodgers

CROOK COUNTY JUDGE

pc: Norm Thompson, Roadmaster